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FILED
Clerk
District Court

JUN 12 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KENNETH COUTURE.

CIVIL ACTION NO. CV05-0024

Plaintiff.

V.

AMERICAN OVERSEAS MARINE
CORPORATION and GENERAL
DYNAMICS CORPORATION.

**STIPULATION EXTENDING CASE
MANAGEMENT ORDER
DEADLINES**

Defendants.

WHEREAS, the parties have retained multiple experts in this case and, despite due diligence, require additional time to obtain expert reports; and

WHEREAS, the plaintiff has encountered difficulty in producing plaintiff's expert reports and, despite due diligence, requires additional discovery time for this task;

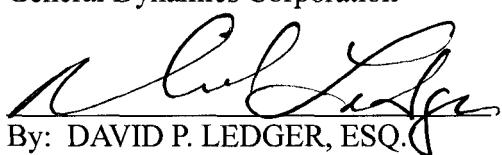
1 WHEREAS, even with the exercise of due diligence, the parties are unable to meet the
 2 existing Case Management deadlines for expert witness reports and expert witness discovery;

3 The parties hereby STIPULATE to extend forthcoming deadlines listed in the Case
 4 Management Scheduling Order, filed on September 20, 2005, approximately 90 days to allow for
 5 the orderly accomplishment of the foregoing. The parties propose the following Case
 6 Management Order deadlines:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
8 Plaintiff's Expert Disclosures	April 3, 2006	June 16, 2006
9 Defendant/Third Party Defendant 10 Expert Disclosures	April 24, 2006	August 18, 2006
11 Completion of Expert Discovery	June 1, 2006	September 29, 2006
12 Hearing on Dispositive Motions	July 13, 2006	November 10, 2006
13 Settlement Conference	July 21, 2006 @ 9:00 a.m.	July 21, 2006 @ 9:00 a.m.
14 Jointly-prepared Final Pretrial 15 Order pursuant to Local Rule 16 16.2CJ.e.9	August 11, 2006	November 6, 2006
17 Final Pretrial Conference	August 18, 2006 @ 9:00 a.m.	November 17, 2006 @ 9:00 a.m.
18 Trial	August 28, 2006 @ 9:00 a.m.	November 27, 2006 @ 9:00 a.m.

21 SO STIPULATED AND AGREED TO.

22 CARLSMITH BALL LLP
 23 Attorneys for Defendants American
 24 Overseas Marine Corporation and
 General Dynamics Corporation

25 
 26 By: DAVID P. LEDGER, ESQ.

27 Date: June 8, 2006

28 LAW OFFICE OF WILLIAM M. FITZGERALD
 Attorney for Plaintiff

29 
 30 By: WILLIAM M. FITZGERALD, ESQ.

31 Date: June 12, 2006